

Worksheet
Documentation of Land Use Plan Conformance and
Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)
Arcata, CA Field Office

DOI-BLM-CA-N030-2015-0008-DNA

Reference Environmental Documents:

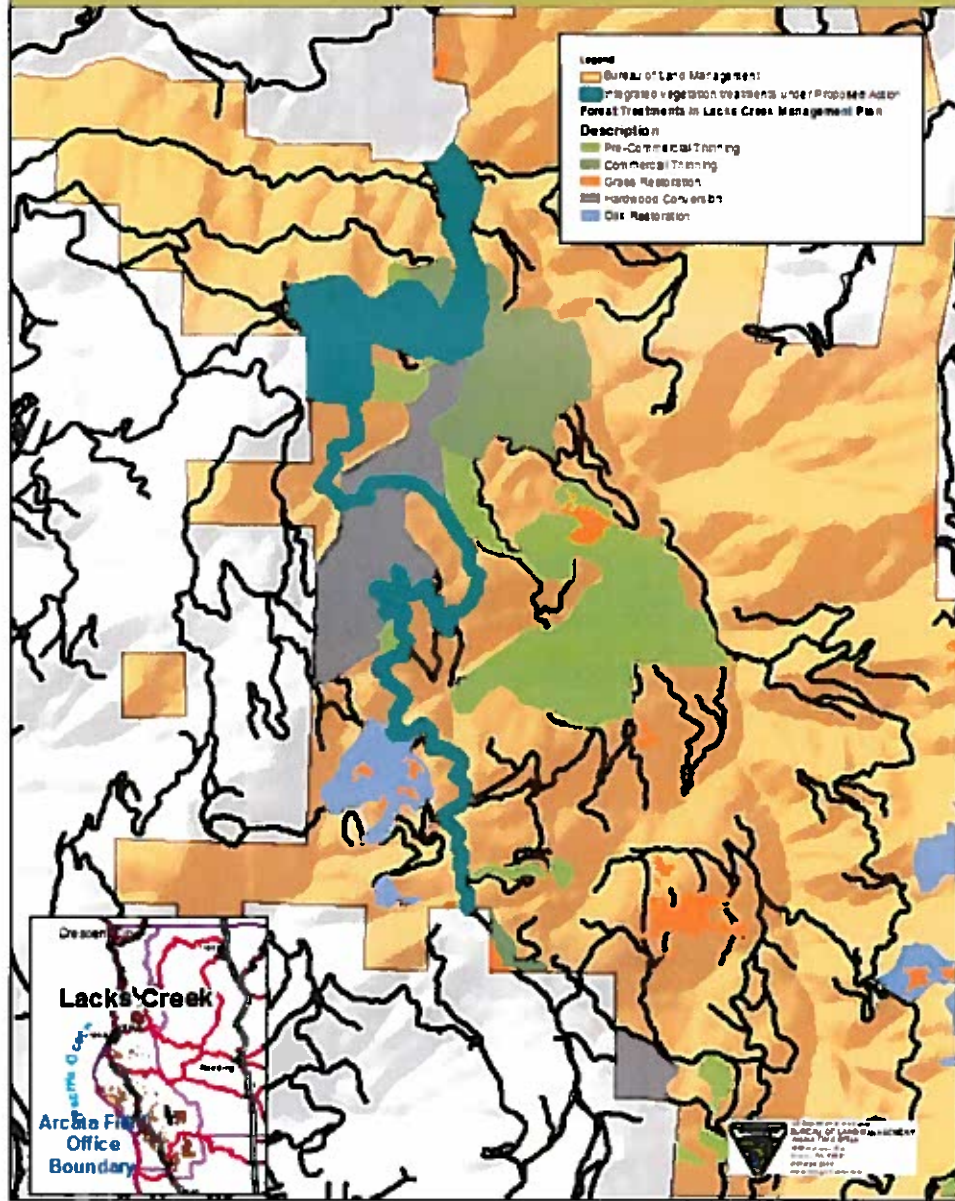
Lacks Creek Plan: AR-08-15
Lacks Creek Management Plan Update: DOI-BLM-CA-N030-2009-0003-EA

Proposed Action Title: Lacks Creek West Side Integrated Vegetation Management

The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures. This analysis can provide background documentation for a new decision record coupled to an existing environmental assessment, or to the existing decision record.

A. Description and Location of Proposed Action: Lacks Creek is located in California's northern Coast Range, approximately 15 miles inland from the Pacific Ocean (T8N, R3E Sections 34, 35, 36 and T7N, R3E, Sections 1, 2, 3, 4, 10, 11, 12, 13, 14, and 24). The area is in Humboldt County, approximately 20 miles northeast of Eureka. The Proposed Action would take place in the northwest corner of the Lacks Creek Management area (Figure 1).

Lacks Creek West Side Integrated Vegetation Management DNA



The Proposed Action consists of thinning and fuels treatments within approximately 303 additional acres along the primary road system on the west side of Lacks Creek.

The Proposed Action is located in an area of Lacks Creek currently infected by the pathogen *Phytophthora ramorum*, commonly known as 'sudden oak death' (SOD). Hardwood thinning treatments in the Proposed Action would mirror adjacent treatments already implemented to promote forest resiliency and reduce fuel loads from SOD infection.

Under the Proposed Action, hardwood and conifer stands within 100 feet of the primary Lacks Creek west side road network would be thinned with commercial and pre-commercial thinning treatments. Thinning would be limited to co-dominant and suppressed trees in treatments designed to increase the size of residual trees and promote late seral stage characteristics. Activity fuels generated from forest treatments will be removed or pile burned on site. All treatments in the Proposed Action have been designed to conform with treatments previously described in the existing analysis of the Lacks Creek Management Plan.

B. Conformance with Resource Management Plan and Consistency with Related Subordinate Implementation Plans

The Proposed Action is in conformance with the Arcata Resource Area RMP (1992, as amended) and the Northwest Forest Plan (1994) because it is specifically provided for in the following decisions:

Arcata Resource Area RMP Amendment (1996):

I. A. 2 (Page 2-23): Re-establish and accelerate development of mature forest structural characteristics on previously entered stands for long-term restoration of this element of biological diversity.

Northwest Forest Plan (1994):

Standards and Guidelines, Late-Successional Reserves, Objectives (Page C-11): Late-Successional Reserves are to be managed to protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old-growth related species including the northern spotted owl. These reserves are designed to maintain a functional, interacting, late-successional and old-growth forest ecosystem.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

Lacks Creek Plan: AR-08-15, Signed 9-30-2008

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes ☒ [X]

No ☐ []

Beyond being located in the same management area as previously described in the Lacks Creek Management Plan, the proposed action is spatially located directly adjacent to areas already analyzed. Implementation actions in the proposed action could easily overlap into areas already analyzed under existing NEPA documents. Geographic and resource conditions are very similar to those already analyzed in the Lacks Creek Management Plan. All treatments in the proposed action have been designed to conform with treatments previously described in the existing analysis of the Lacks Creek Management Plan.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, public interests, and resource values?

Yes ☒ [X]

No ☐ []

The 2008 Lacks Creek Plan included a proposed action and one alternative. One of the primary differences between the alternatives was different vegetation treatments under Forest Management. In addressing this range of alternatives the Lacks Creek Plan addressed environmental concerns, public interests, and resource values similar to those being considered under the current proposed action.

3. Is existing analysis adequate in light of any new information or circumstances (including rangeland health standards assessments, inventory and monitoring data; updated threatened, endangered, proposed, and candidate species lists and updated BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Yes ☒ [X]

No ☐ []

All changed circumstances have been addressed in this analysis, based on input from an interdisciplinary team of resource specialists. This includes inventory and monitoring data, updated threatened, endangered, proposed and candidate species lists and BLM lists of sensitive species. Additional archaeological surveys were conducted in the area of the proposed action in April of 2015 to ensure conformance with the State Historic Preservation Office (SHPO).

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes ☒ [X]

No ☐ []

Impacts of the proposed action are substantially the same as those analyzed in the existing Lacks Creek Management Plan. Aside from minor changes in terms of treatment location, the direct, indirect, and cumulative effects of implementation have already been analyzed in existing NEPA documentation. New surveys and information obtained from the publication of the Lacks Creek Management Plan have not resulted in changed circumstances from the original publication. The proposed action has been thoroughly reviewed by resource specialists to ensure that impacts from implementation have already been analyzed in sufficient site-specific detail.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes ☒ [X]

No ☐ []

During the thorough effort of consultation and coordination that was undertaken for the development of the Lacks Creek Management Plan (public scoping, agency coordination, public outreach, presentation to Resource Advisory Council) the BLM received broad support for the ecosystem restoration actions proposed in the plan including vegetation treatments. Subsequently when SOD was detected in the Lacks Creek watershed, BLM partnered with UC Davis Cooperative Extension to develop treatment options. BLM hosted a meeting and led several field trip to Lacks Creek in 2014 discuss treatment

options. Meeting and field trip attendees included representatives from U.S. Fish and Wildlife Service, UC Davis, Humboldt State University, U.S. Forest Service, the Hoopa Tribe, Redwood National and State Parks.

E. Persons/Agencies/BLM Staff Consulted

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Sam Flanagan	Geologist	Arcata BLM
Jennifer Wheeler	Botany/Range/Weeds	Arcata BLM
Tim Jones	Fire Management Officer	Arcata BLM
Jesse Irwin	Wildlife	Arcata BLM
Dan Wooden	Forester	Arcata BLM
Gina Munson	Archaeologist	Arcata BLM
Eric Ritter	Archaeologist	Redding BLM
Aaron Donnell	Fisheries Biologist	Arcata BLM
David LaFever	Forest Ecologist	Arcata BLM
David Fuller	NEPA Coordinator	Arcata BLM
Richard Cobb	Post Doctoral Researcher/pathology	University California Davis
Leonel Arguello	Chief, Vegetation Management	Redwood National Park
Yana Valachovic	Forest Advisor	UC Cooperative Extension
Darin Jarnaghan Sr.	Forest Manager	Hoopa Tribal Forestry

CONCLUSIONS


Based on the review documented above, it is concluded that:

Determination of NEPA Adequacy

[X] The existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

[] The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.

Prepared By:


Signature

Date 8/10/15

Reviewed By:


Planning/NEPA Coordinator

Date 8/10/15

Reviewed By:


Assistant Field Manager

Date 8/11/15

Approved By:


Authorized Officer

Date 8/11/15

Note: The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision.

Decision and Rationale

It is the decision of the BLM Arcata Field Office to implement the proposed action of commercial thinning, pre-commercial thinning, and hardwood conversion and sudden-oak death mitigation treatments in the Lacks Creek Management Area. These restoration based treatments, similar to others previously described in the Lacks Creek Management Plan, have been evaluated by resources specialists and will contain mitigation measures designed to minimize any negative impacts of their implementation. These mitigation measures include; setbacks from riparian areas and unstable slopes, a fuels reduction component to reduce hazardous fuels accumulations, cultural surveys to ensure no sensitive sites are disturbed, and compliance with existing wildlife limited operating periods when habitats are threatened by implementation actions. The selected alternative best meets the purpose and need for the project which is to thin stands to promote forest resiliency, later seral stage characteristics, and reduce hazardous fuel loadings. This project is not expected to adversely impact elements of the human environment due to design features and operations criteria. This decision is consistent with the Lacks Creek

Management Plan and other relevant laws, regulations and policies guiding management of the project area. The existing environmental analysis and finding of no significant impact contained in Lacks Creek Plan: AR-08-15, Signed 9-30-2008 fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Administrative Remedies

Administrative remedies may be available to those who believe they will be adversely affected by this decision. Appeals may be made to the Office of Hearings and Appeals, Office of the Secretary, U.S. Department of Interior, Board of Land Appeals (Board) in strict compliance with the regulations in 43 CFR Part 4. Notices of appeal must be filed in this office within 30 days after publication of this decision. If a notice of appeal does not include a statement of reasons, such statement must be filed with this office and the Board within 30 days after the notice of appeal is filed. The notice of appeal and any statement of reasons, written arguments, or briefs must also be served upon the Regional Solicitor, Pacific Southwest Region, U.S. Department of Interior, 2800 Cottage Way, E-1712, Sacramento, CA 95825.

The effective date of this decision (and the date initiating the appeal period) will be the date this notice of decision is posted on BLM's Arcata Field Office internet website.



Molly Brown
Arcata Field Manager

Date 8/11/15